

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

RUSSELL, *et al.*,
Plaintiffs,

V.

HARRIS COUNTY, TEXAS, *et al.*,
Defendants.

Case No. 4:19-cv-00226
(Class Action)

**DECLARATION OF DIRECTOR OF DEPARTMENT OF PUBLIC SAFETY
STEVEN MCCRAW**

1. My name is Steven McCraw, I currently serve as the Director of the Texas Department of Public Safety. I have served in this role since August 2009. I began my law enforcement career with DPS in 1977 as a Trooper in the Texas Highway Patrol and later as a DPS Narcotics Agent. In 1983, I became a Special Agent in the Federal Bureau of Investigation and served in Dallas, Pittsburgh, Los Angeles, Tucson, San Antonio, and Washington, DC. In 2004 I retired as an Assistant Director from the FBI to become the Texas Homeland Security Director in the Office of the Governor where I served for five years.
 2. The mission of the Texas Department of Public Safety is to protect and serve Texas and as Director and Colonel for the Department, I am responsible for all department operations and personnel throughout the state.
 3. Texas faces the full spectrum of threats to public safety and has limited law enforcement resources at the local, state and federal level to protect people and property from harm. The current COVID-19 pandemic has further diminished law enforcement capacity throughout the state at a time when more law enforcement resources are needed to address crime.
 4. Major urban areas in the state have experienced an increase in violent crime over the last year including serial robberies conducted by crews or small units of gang members. Armed robberies are a significant problem in Harris County. Takeover-style robberies in which armed gangs storm into businesses occupied by the public for the purposes of robbing the business and customers have been

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especially concerning. As a result, Governor Abbott directed DPS to assign DPS Special Agents, Troopers, Analysts and Aircraft to provide direct support to local law enforcement agencies in Harris County in order to reduce the number of gang-related takeover robberies and other violent crimes threatening public safety.

5. It is my understanding that the Plaintiffs in this lawsuit are seeking an order releasing over 4,000 felony arrestees from the Harris County Jail.
6. Based on my training, experience, and understanding of the current circumstances in Harris County and throughout the State, I believe that such releases would strain the already limited law enforcement resources and pose an increased danger to Texans.
7. For example, DPS Troopers and Special Agents have arrested 373 robbery suspects in Harris County since April, 2017 in support of local law enforcement agencies in Harris County at the direction of the Governor. These 373 robbery suspects belonged to 188 robbery crews that were responsible for 620 armed robberies. Members of these robbery crews tend to be vocational criminals who present a high probability of quickly reoffending upon release. Several of the robbery suspects described in the paragraph were on bond at the time of their arrest.
8. I believe releasing felony arrestees into the community undermines public safety in the best of circumstances, but doing so during a pandemic is particularly dangerous. DPS officers are involved heavily in responding to the public health crisis. For example, DPS officers are involved in the enforcement of Executive Orders issued by the Governor in response to the pandemic. Additionally, law enforcement agencies in Texas have seen commissioned officers become unavailable for service because of illness and the need to self-isolate after exposure to the coronavirus. As law enforcement expends resources to support the public health response, our ability to address the new crimes that will be committed by released felons becomes more limited. The current crisis presents an especially dangerous moment to release felony arrestees into our communities.

Date: 03-31-2020

Steven C. McCraw
Steven McCraw
Director
Texas Department of Public Safety